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September 17, 2020

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 9/20/2020

VIA CM/ECF

The Honorable Vernon S. Broderick
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Great Western Insurance Company v. Mark Graham, et. al.*, No. 18-cv-06249.

Dear Judge Broderick:

We represent plaintiff Great Western Insurance Company (“Great Western”).

Due to a sudden family tragedy, we write to request that the Court extend the deadline for Great Western and defendants Wilmington Savings Fund Society, FSB and Christiana Trust (“WSFS”) to file any letter motions regarding jurisdictional discovery. The deadline is currently set for September 18, 2020, and opposition letter motions for September 25, 2020. *See* Dkt. 202.

Upon learning of the tragedy today, counsel for Great Western immediately notified counsel for WSFS, who graciously consented to our request for an extension.

At this time, it is unknown how long of an extension will be necessary. However, Great Western proposes that it will work with counsel for WSFS as soon as practicable, and we hope, and expect, to be able to come back to the Court in the near future with a proposed schedule agreed upon by both parties.

Very truly yours,



Stephen W. McInerney